UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

:

In re: Valsartan, Losartan & Irbesartan Products Liability

Irbesartan Products Liability

Litigation

MDL No. 2875

:

WAIVER OF SERVICE OF SUMMONS FOR MASTER IRBESARTAN PERSONAL INJURY COMPLAINT

To: Marlene J. Goldenberg, Esq.

Goldenberg Law

Attorneys for Plaintiffs

I have received your request to waive service of a summons in this action along with a copy of the Complaint, two copies of this waiver of service form, and a prepaid means of returning one signed copy of the waiver form to you.

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco Healthcare U.S. LLC, I waive service of the summons and Complaint in this case.

In waiving service of process, Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco Healthcare U.S. LLC, preserve all of their defenses and objections to the lawsuit, the court's jurisdiction, and the venue of the action.

I also understand that the Court has stayed the deadline to serve an answer or a motion under Rule 12 to this Complaint.

DATE: February 18, 2021 By: <u>/s/ Seth A. Goldberg</u>

PARTIES: Zhejiang Huahai DUANE MORRIS LLP

Pharmaceutical Co., Ltd., Seth A. Goldberg Huahai U.S., Inc., 30 South 17th Street

Prinston Pharmaceutical Inc., Philadelphia, Pennsylvania 19103

and Solco Healthcare U.S. LLC Tel.: (215) 979-1000 Fax: (215) 979-1020

SAGoldberg@duanemorris.com

Attorneys for Zhejiang Huahai

Pharmaceutical Co, Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco

Healthcare U.S., LLC